

# **EXHIBIT 7**

UNITED STATES BANKRUPTCY COURT  
DISTRICT OF MINNESOTA

In re

**IMERYS TALC  
AMERICA, INC., et al.,**

Debtors,

Bankruptcy Case No.: 01-40000- KHS

[MNB – INTERNAL CASE]

(United State Bankruptcy Court for the District  
of Delaware Case No. 19-10289 (LSS))  
(Chapter 11)

**EYDIE HAUER**, As Trustee for the Next-  
of-Kin of **CONNIE GRAY**, Deceased,

Adversary Proceeding No. 19-04109-KHS

Plaintiff,

vs.

**BRENNTAG NORTH AMERICA, INC.,  
et al.,**

Defendants.

**PLAINTIFF’S NOTICE OF HEARING AND MOTION FOR REMAND**

TO: Removing Defendants Johnson & Johnson and Johnson & Johnson Consumer, Inc.:

Plaintiff, Edyie Hauer, as Trustee for the Next-of-Kin of Connie Gray, Deceased, by and through the undersigned counsel (“Plaintiff”) files this Notice of Hearing and Motion for Remand of this adversary proceeding (the “Motion”). In support of the Motion, the Plaintiff states as follows:

1. The court will hold a hearing on the Motion at 10:30 a.m. on June 5, 2019, before the Honorable Kathleen H. Sandberg, Courtroom 8W, 300 South Fourth Street, Minneapolis, MN 55415.

2. Under Local Rule 9006-1(c), any response to the Motion must be filed and served by delivery or by mail not later than five calendar days before the hearing date including Saturdays,

Sundays and holidays. UNLESS A RESPONSE OPPOSING THE MOTION IS TIMELY FILED, THE COURT MAY GRANT THE MOTION WITHOUT A HEARING.

3. This Motion for Remand is filed under 28 U.S.C. § 1452 and § 1447(c),

4. On April 19, 2019, the removing Defendants Johnson & Johnson and Johnson & Johnson Consumer, Inc. filed a Notice of Removal to this Court.

5. As further set forth in Plaintiff's supporting Memorandum of Law, this Court does not have subject matter jurisdiction over this matter as Plaintiff's claims are not "related to" the pending bankruptcy proceeding *In re Imerys Talc America, Inc. et al.*, Bankr. Case No. 19-10389 (LSS) (D. Del.). Further, even if the Court has "related to" jurisdiction, mandatory abstention under 28 U.S.C. § 1334(c)(2), equitable remand under 28 U.S.C. §1452(b) and permissive abstention under 28 U.S.C. §1334(c) all require remand.

WHEREFORE, Plaintiff respectfully asks that this Honorable Court grant her Motion for Remand, deny Johnson & Johnson's request for further briefing and hearing, and Remand Plaintiff's case back to the Minnesota District Court for the Second Judicial District, County of Ramsey pursuant to 28 U.S.C. §§ 1441 and 1447(c).

Respectfully submitted this 3<sup>rd</sup> day of May, 2019.

By: /e/ Amy J. Swedberg  
Amy J. Swedberg (Atty. No. 271019)  
[amy.swedberg@maslon.com](mailto:amy.swedberg@maslon.com)  
Maslon LLP  
90 South 7<sup>th</sup> Street, Suite 3300  
Minneapolis, MN 55402  
Telephone: (612) 672-8367

Conor Nideffer (*pro hac vice pending*)  
[cnideffer@sgptrial.com](mailto:cnideffer@sgptrial.com)  
SIMON GREENSTONE PANATIER, P.C.  
CA Bar 253931  
3780 Kilroy Airport Way, Suite 540  
Long Beach, CA 90806

Phone: (562) 590-3400  
Fax: (562) 590-3412

*Attorneys for Plaintiff*